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13 Attorneys for Defendants,
14 County of Los Angeles, *et al.*

15 UNITED STATES DISTRICT COURT

16 CENTRAL DISTRICT OF CALIFORNIA, WESTERN DIVISION

17 REBECCA A. RICKLEY,
18

19 Plaintiff,

20 v.
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22 COUNTY OF LOS ANGELES, WILLIAM
HOWARD, KEVIN PETROWSKY,
23 SOHEILA KALHOR, MICHAEL TRIPP,
24 RAJESH PATEL and DOES 2 THROUGH
20, INCLUSIVE,
25

26 Defendants.
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Case No. CV08-4918-SVW(AGRx)

PROTECTIVE ORDER
REGARDING PERSONNEL
FILES; EXHIBIT A

1 Pursuant to the Stipulation for Protective Order Relating to Personnel Files,
2 IT IS HEREBY ORDERED:

3 All documents in the personnel files being produced by the County of Los
4 Angeles relating to Defendants Kevin Petrowsky, Michael Tripp and Soheila Kalhor
5 will be held confidential by Plaintiff, subject to the terms and conditions of the
6 Stipulation executed by Counsel of Record for the Parties and attached hereto as
7 Exhibit A.

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9 Dated: February 6, 2009



HONORABLE ALICIA G. ROSENBERG
UNITED STATES MAGISTRATE JUDGE

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15 UNITED STATES DISTRICT COURT

16 CENTRAL DISTRICT OF CALIFORNIA, WESTERN DIVISION

17 REBECCA A. RICKLEY,

18 Plaintiff,

19 v.

20
21 COUNTY OF LOS ANGELES,
22 WILLIAM HOWARD, KEVIN
23 PETROWSKY, SOHEILA KALHOR,
24 MICHAEL TRIPP, RAJESH PATEL and
DOES 2 THROUGH 20, INCLUSIVE,

25 Defendants.
26

Case No. CV08-4918-SVW(AGR_x)

STIPULATION FOR PROTECTIVE
ORDER RELATING TO PERSONNEL
FILES

[Proposed] Protective Order submitted
concurrently

Hon. Stephen V. Wilson

27 **EXHIBIT A**
28

1 WHEREAS, Plaintiff Rebecca A. Rickley served a Notice of Taking
2 Deposition and Demand to Produce Documents in this action on Defendants Kevin
3 Petrowsky, Michael Tripp, and Sohelia Kalhor (“County Individual Defendants”)
4 seeking various documents including their respective personnel records.

5 WHEREAS, the County of Los Angeles has firm policies restricting access to
6 personnel files. Pursuant to these policies, only County management, not individual
7 employees, may exercise custody or control over personnel files. Therefore, the
8 County Individual Defendants initially objected to Plaintiff’s requests for production
9 of these documents. Subsequently, the parties have met and conferred over this
10 issue.

11 WHEREAS, in an effort to resolve this dispute, the County of Los Angeles
12 will agree to provide copies of the personnel files for Defendants Petrowsky, Tripp
13 and Kalhor subject to agreement by Plaintiff to the terms of this Stipulation for
14 Protective Order. All personal information in the personnel files has been redacted
15 and certain documents which contain solely personal information have been
16 withheld (*i.e.*, medical records, home phone numbers, social security data, etc.)
17 because this information is privileged and confidential and because it was
18 specifically excluded from the document requests.

19 NOW, THEREFORE, IT IS HEREBY STIPULATED and agreed by and
20 between Plaintiff Rebecca A. Rickley, and County Individual Defendants Kevin
21 Petrowsky, Michael Tripp, and Sohelia Kalhor, through their counsel of record, that
22 a Protective Order may be entered in the above-captioned action.

23 A. The following definitions apply herein:

24 1. “Personnel files” shall mean those official files maintained by
25 the Human Resources Department of the County of Los Angeles for employees
26 Kevin Petrowsky, Michael Tripp, and Sohelia Kalhor and which contain official
27 information relating to their employment with the County.

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1 2. “Party” means a named party to this action.

2 3. “Counsel of Record” means the attorneys and law firms which
3 have formally appeared as counsel of record for any Party, including all attorneys,
4 paraprofessionals, clerks and secretaries associated with or employed by such
5 attorneys and law firms.

6 4. “Expert/Consultant” means any person hired to assist a Counsel
7 of Record in the litigation or trial of this action, including that person’s partners,
8 associates and staff.

9 B. All documents in the personnel files of Kevin Petrowsky, Soheila
10 Kalhor and Michael Tripp being produced by the County of Los Angeles will be
11 held confidential by Plaintiff, subject to the terms of this Stipulation for Protective
12 Order and the Protective Order submitted concurrently herewith.

13 C. All documents produced pursuant to this Stipulation and the Protective
14 Order shall be used solely in connection with this litigation and the preparation and
15 trial of this case, or any related appellate proceeding, and not for any other purpose,
16 including any other litigation. Copies of these documents will not be made without
17 the express written consent of the County Individual Defendants Kevin Petrowsky,
18 Michael Tripp, and Soheila Kalhor.

19 D. All documents produced pursuant to this Stipulation and the Protective
20 Order may be disclosed only to the following persons:

21 1. Counsel of Record;

22 2. Court personnel including stenographic reporters engaged in such
23 proceedings as are necessarily incidental to preparation for the trial of this action;

24 3. Experts/consultants; and

25 4. Witnesses may have the documents disclosed to them during
26 deposition proceedings; the witnesses may not leave the deposition with copies of
27 the documents and shall be bound by the provisions of this Stipulation and the
28 Protective Order.

1 E. Each person to whom disclosure is made, with the exception of
2 Counsel of Record who are presumed to know of the contents of this Stipulation and
3 the Protective Order, shall prior to the time of disclosure be provided by the person
4 furnishing him/her such material a copy of the Protective Order and shall agree on
5 the record or in writing that he/she has read and will abide by this Stipulation and
6 the Protective Order. Unless made on the record in this litigation, counsel making
7 the disclosure to any person described above shall retain the original executed copy
8 of said agreement until final termination of this litigation.

9 F. Provisions of this Stipulation and the Protective Order insofar as they
10 restrict disclosure and use of the material shall be in effect until further order of this
11 Court.

12 G. This Stipulation and the Protective Order shall not affect the right of
13 any Party to object to the production of any documents provided pursuant to the
14 Protective Order or to demand more stringent restrictions upon the treatment and
15 disclosure of any documents or materials, on the ground that such documents or
16 materials contain particularly sensitive information, or otherwise.

17 H. At the conclusion of this litigation, all copies of documents produced
18 pursuant to this Stipulation and Protective Order will be destroyed.

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1 I. This instrument may be signed in counterparts and shall become
2 effective upon signature by Counsel of Record for the Parties hereto. A signature on
3 a faxed or emailed signature page shall have the same effect as an original signature.
4

5 IT IS SO STIPULATED.

6 DATED: January ____, 2009 LAW OFFICES OF NATASHA ROIT

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NATASHA ROIT
9 Attorney for Plaintiff REBECCA A. RICKLEY

10 DATED: January ____, 2009 MEYERS, NAVE, RIBACK, SILVER & WILSON

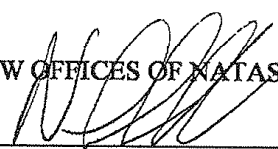
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DEBORAH J. FOX
13 Attorney for Defendants WILLIAM HOWARD,
14 KEVIN PETROWSKY, SOHEILA KALHOR and
MICHAEL TRIPP

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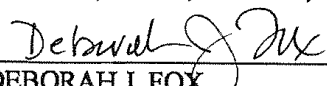
1 I. This instrument may be signed in counterparts and shall become
2 effective upon signature by Counsel of Record for the Parties hereto. A signature on
3 a faxed or emailed signature page shall have the same effect as an original signature.
4

5 IT IS SO STIPULATED.

6 DATED: January 29, 2009 LAW OFFICES OF NATASHA ROIT

7 
8 NATASHA ROIT
9 Attorney for Plaintiff REBECCA A. RICKLEY

10 DATED: January ^{Feb} 2, 2009 MEYERS, NAVE, RIBACK, SILVER & WILSON

11 
12 DEBORAH J. FOX
13 Attorney for Defendants WILLIAM HOWARD,
14 KEVIN PETROWSKY, SOHEILA KALHOR and
15 MICHAEL TRIPP

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